1 2 3 4 5 6 7	Donald E.J. Kilmer, Jr. (SBN: 179986) E-Mail: Don@DKLawOffice.com Jason A. Davis (SBN: 224250) E-Mail: Jason@CalGunLawyers.com 1645 Willow Street, Suite 150 San Jose, California 95125-5120 Voice: (408) 264-8489 Fax: (408) 264-8487 Attorneys for Plaintiffs		
8 9	UNITED STATES FOR THE NORTHERN I		
110 111 112 113 114 115 116 117	MARK AARON HAYNIE, BRENDAN JOHN RICHARDS, THE CALGUNS FOUNDATION, INC., and THE SECOND AMENDMENT FOUNDATION, INC., Plaintiffs, vs. KAMALA HARRIS, Attorney General of California (in her official capacity) and CALIFORNIA DEPARTMENT OF JUSTICE, CITY OF ROHNERT PARK, OFFICER DEAN BECKER (RP134), and DOES 1 TO 20, Defendants.	ADMINIST P <del>ROPOS</del> E	3:10-CV-01255 SI 3:11-CV-02493 SI (Consolidated Cases)  TION and JOINT TRATIVE MOTION and D ORDER Janagement
19   20   21   22   23   24   25   26   27   28	BRENDAN JOHN RICHARDS, THE CALGUNS FOUNDATION, INC., and THE SECOND AMENDMENT FOUNDATION, INC., Plaintiffs, vs.  KAMALA HARRIS, Attorney General of California (in her official capacity) and CALIFORNIA DEPARTMENT OF JUSTICE, SONOMA COUNTY SHERIFFS' OFFICE, SHERIFFS' DEPUTY GREG MYERS (SD1023) and DOES 1 TO 20, Defendants.	ADMINIST PROPOSE	3:11-CV-05580 SI (Related Case)  CION and JOINT CRATIVE MOTION and D ORDER Ianagement

28

MAX JOSEPH PLOG-HOROWITZ, THE CALGUNS FOUNDATION, INC., and THE SECOND AMENDMENT FOUNDATION, INC., Plaintiffs,

VS.

KAMALA HARRIS, Attorney General of California, CALIFORNIA DEPARTMENT OF JUSTICE, COTATI POLICE DEPARTMENT, CITY OF COTATI, ANDREW LYSSAND (CO0339) and DOES 1 TO 20,

Defendants.

Case No.: 3:12-CV-0452 LB

(Related Case)

STIPULATION and JOINT ADMINISTRATIVE MOTION and PROPOSED ORDER Re: Case Management

IT IS HEREBY STIPULATED<sup>1</sup> by and between the parties hereto through their respective attorneys of record that the pending Case Management Conference currently set for May 25, 2012 in Courtroom 10, 19<sup>th</sup> Floor of the U.S. District Court for the Northern District of California should be reset.

The Defendants in *Richards v. Harris I (Rohnert Park)*, Case No.: 3:11-CV-02493 SI have a motion to dismiss under submission that has been fully briefed and was argued on May 4, 2012.

Furthermore, it would appears that a settlement has been reached between the plaintiffs and the Sonoma County Defendants in *Richards v. Harris II (Sonoma County)*, Case No.: 3:11-CV-05580 SI. The parties are in the process of executing the necessary documents for settlement, release and dismissal of those Defendants in that case.

<sup>&</sup>lt;sup>1</sup> Haynie v. Harris, Case No.: 3:10-CV-01255 SI was ordered consolidated with Richards v. Harris, Case No.: 3:11-CV-02493 SI, in an ordered filed on October 22, 2011. (See Documents # 42 and #15 respectively. The second Richards v. Harris, Case No.: 3:11-CV-05580 was ordered to be related with the first two cases in an order filed on December 21, 2011. (See documents #47 and # 20 respectively.) The Ploghorowitz v. Harris, Case No.: 3:12-CV-0452 SI was ordered to be related on April 11, 2012. (See documents #32 and #20)

1	The remaining parties propose that the Court reset the Case Management		
2	Conference to some date after the Court anticipates releasing its order from the		
3	May 4, 2012 hearing.		
4	SO STIPULATED.		
5	Date: May 16, 2012 Date: May 16, 2012		
6			
7	Counsel for Defendants Counsel for Plaintiffs		
8	Harris & California Dept. of Justice		
9	Date: May 16, 2012 Date: May 16, 2012		
10			
11	Counsel for Defendants Counsel for Defendants		
12	City of Rohnert Park & Becker Sonoma County & Myer Counsel for Defendants		
13	Cotati Police Department, City of Cotati, & Lyssand		
14	ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND LOCAL RULE VIII.B.  I, Donald Kilmer, declare under penalty of perjury under the laws of California and the United States that I have in my possession e-mail correspondence from Ross Moody, Robert Henkels and Anne Keck that the content of this document is acceptable to all persons required to sign the document. I declare that this document was signed in San Jose, CA on May 16, 2012.  /s/ Donald Kilmer Attorney for Plaintiffs		
15			
16			
17			
18			
19			
20			
21	ORDER		
22	The Case Management Conference in these consolidated and related matters		
23	currently set for May 25, 2012 is reset to: (Date)		
24	(Time):3:00, in Courtroom 10, 19 <sup>th</sup> Floor of the U.S. District Court for the		
25	Northern District of California – San Francisco. A Joint Case Management		
26	Conference Statement shall be filed seven (7) calendar days before the new date.		
27	Date: 5.19.12		
28	United States District Judge		